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*Attorneys for Involuntary Plaintiff Thales Visionix, Inc.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

GENTEX CORPORATION and INDIGO  
TECHNOLOGIES, LLC,

Plaintiffs,

THALES VISIONIX, INC.,

Involuntary Plaintiff,

v.

META PLATFORMS, INC. and META  
PLATFORMS TECHNOLOGIES, LLC,

Defendants.

Case No. 4:22-cv-03892-YGR

**DECLARATION OF PAUL N.  
TAUGER IN SUPPORT OF  
INVOLUNTARY PLAINTIFF THALES  
VISIONIX, INC.'S ADMINISTRATIVE  
MOTION TO SEAL PORTIONS OF  
RESPONSE TO JOINT MOTION TO  
DISMISS**

**Date:** February 20, 2024

**Time:** 2:00 p.m.

**Location:** Courtroom 1, 4th Floor

**Judge:** Hon. Yvonne Gonzalez Rogers

1 I, Paul N. Tauger, do hereby declare as follows:

2 1. I am an attorney licensed to practice law in the States of California. I am an associate  
3 with AddyHart P.C., located at 5151 California Street, Suite 100, Irvine, CA 92617. I am counsel for  
4 Involuntary Plaintiff Thales Visionix, Inc. (“Thales”) in the above-captioned action. I have personal  
5 knowledge of the matters set forth below and if called and sworn as a witness, I could and would  
6 testify competently to the facts set forth herein.

7 2. I make this declaration in support of Thales’s Administrative Motion to Seal Portions  
8 of the Response to the Joint Motion to Dismiss. I am familiar with Thales’s treatment of highly  
9 proprietary and confidential information based on my personal experience representing Thales.

10 3. I make this declaration in accordance with Local Rules 7-11(a) and 79-5 in support of  
11 Thales’s Administrative Motion to File Under Seal Portions of and Exhibits to the Response to the  
12 Joint Motion to Dismiss.

13 4. Exhibit A to the Joint Motion to Dismiss is a copy of a settlement agreement  
14 (“Settlement Agreement”) signed between Gentex Corporation and Indigo Technologies, LLC  
15 (collectively, “Gentex”) and Meta Platforms, Inc. and Meta Platforms Technologies, LLC  
16 (collectively, “Meta”). (ECF No. 140, ¶ 4). Exhibit B to the Joint Motion to Dismiss is a Term Sheet  
17 (“Term Sheet”) signed by Thales, Gentex, and Meta. (Id.).

18 5. Exhibit 1 to the Response to the Joint Motion to Dismiss is a true and correct copy of  
19 an email (“Email”) sent from Meredith Martin Addy on December 22, 2023 to Ellisen Turner, counsel  
20 for Meta, and to Adam Harber, counsel for Gentex, in which Thales withdrew from the Term Sheet.

21 6. The Settlement Agreement and Term Sheet reflect confidential business information of  
22 the Parties, including financial terms and details of confidential licensing negotiations. Such details  
23 constitute sensitive business information, not publicly available or publicly disclosed, which the  
24 Parties maintain in the strictest confidence. To make publicly available these details about the Parties’  
25 licensing activities would cause substantial economic and competitive harm to the Parties, including  
26 Thales.

27 7. Certain portions of the Response to the Joint Motion to Dismiss discuss the terms of  
28 the Agreement and Term Sheet. These portions also reflect sensitive business information about the

1 Parties' licensing practices, disclosure of which would cause substantial economic and competitive  
2 harm to the Parties, including Thales. The narrowly tailored portions of the Response to the Joint  
3 Motion that reflect or contain these confidential details are highlighted in yellow.

4 8. I declare under penalty of perjury under the laws of the United States of America that  
5 the foregoing is true and correct to the best of my knowledge.

6 Executed this 26th day of January, 2024, in Irvine, California.

7  
8 /s/ Paul N. Tauger

9 Paul N. Tauger

10 *Counsel for Involuntary Plaintiff*  
11 *Thales Visionix, Inc.*  
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